

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ALABAMA
MOBILE DIVISION**

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| SOLOMON WILLIAMS | * | CIVIL ACTION NO. 09-0511 KD-M |
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| VERSUS | * | JUDGE KRISTI K. DuBOSE |
| | * | |
| AET, INC. LIMITED, ET AL | * | MAGISTRATE (1) |
| | * | BERT W. MILLING, JR. |

THIRD SUPPLEMENTAL AND AMENDING COMPLAINT

TO THE HONORABLE, THE JUDGES OF THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT OF ALABAMA, MOBILE DIVISION:

NOW INTO COURT, through undersigned counsel, comes SOLOMON WILLIAMS, who moves this Honorable Court to allow him to supplement and amend his original, first, and second supplemental complaints as follows.

1.

By adding paragraph 12b to his original complaint to read as follows:

“12b”

Plaintiff avers that this Court has Admiralty and Maritime jurisdiction and alternatively pleads his claim under Federal Rule of Civil Procedure 9h.

WHEREFORE, petitioner, reiterating and reaverring each and every allegation of his original complaint as though copied at length herein, prays that his original complaint be supplemented and amended in the above particulars and that, after all legal delays and due proceedings had, there be judgment herein in favor of plaintiff, SOLOMON WILLIAMS, and against defendants, AET INC. LIMITED, ROSS MARITIME USA, INC. and ALBATROSS MARITIME LLC DBA BERT'S LINE HANDLING, INC. in the full sum of ONE MILLION FIVE

HUNDRED THOUSAND DOLLARS AND NO/100 (\$1,500,000) for all costs of court, for legal interest from the day of judicial demand until paid, for trial by jury, for maintenance, cure, penalties and attorney fees and for other and further relief as in law and equity to which he may be entitled.

Respectfully Submitted,
/s/ Darleen M. Jacobs
DARLEEN M. JACOBS, ESQ. - Bar # 7208
823 ST. LOUIS STREET
New Orleans, La. 70112
(504) 522-3287/(504) 522-0155
ATTORNEY FOR PLAINTIFF,
SOLOMON WILLIAMS

PLEASE SERVE DEFENDANTS WITH THE ORIGINAL,
FIRST, SECOND and THIRD SUPPLEMENTAL PETITIONS

AET INC. LIMITED
Though the attorney of record:
Delos E. Flint, Jr.
Anthony D'Alto II.
400 Poydras Street, 30th Floor
New Orleans, La. 70130

ROSS MARITIME USA, INC.
Through the Attorney of Record:
Christopher E. Carey
Alexander L. Burns
3 Sanctuary Blvd, Suite 101
Mandeville, La. 70471

ALBATROSS MARITIME, LLC.
Through the agent for service of process:
Carl Black
1814 Alabama State Docks Blvd
Mobile Alabama, 36602

BERT'S LINE HANDLING
Through the agent for service of process:
Carl Black
1814 Alabama State Docks Blvd
Mobile Alabama, 36602

